

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

APPLETON PAPERS INC. and)
NCR CORPORATION,)

Plaintiffs,)

v.)

No. 08-CV-00016-WCG

GEORGE A. WHITING PAPER)
COMPANY, *et al.*,)

Defendants.)

DECLARATION OF SABRINA MIZRACHI

I, Sabrina Mizrachi, of sound mind and full age, hereby states as follows:

1. I am an associate at the law firm of Greenberg Traurig LLP, attorneys for Defendant P.H. Glatfelter Company (“Glatfelter”), in the above captioned action. I am a licensed attorney in Pennsylvania, Florida, and Maryland, and I am admitted to practice in this Court. I have personal and first-hand knowledge of each of the matters set forth herein, and, if called and sworn as a witness, I can and will testify competently thereto. I submit this declaration in support of FRG Defendants’ Civil Local Rule 7(h) Expedited Non-Dispositive Motion for Protective Order Regarding Discovery from NCR Corporation.

2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff NCR Corporation’s Notice of Deposition Pursuant To Fed. R. Civ. P. 30(b)(6) to Defendant P.H. Glatfelter Co., served on October 4, 2011.

3. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff NCR Corporation's Notice of Deposition Pursuant To Fed. R. Civ. P. 30(b)(6) to Defendant WTM I Company, served on October 4, 2011.

4. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff NCR Corporation's Notice of Deposition Pursuant To Fed. R. Civ. P. 30(b)(6) to Defendant Georgia Pacific, served on September 29, 2011.

5. Attached hereto as **Exhibit D** is a true and correct copy of Plaintiff NCR Corporation's Requests for the Production of Documents to Defendant P.H. Glatfelter Co., served on October 4, 2011.

6. Attached hereto as **Exhibit E** is a true and correct copy of Plaintiff NCR Corporation's Requests for the Production of Documents to Defendant WTM I Company, served on October 4, 2011.

7. Attached hereto as **Exhibit F** is a true and correct copy of Plaintiff NCR Corporation's Requests for the Production of Documents to Defendant Georgia Pacific, served on October 4, 2011.

8. Attached hereto as **Exhibit G** is a true and correct copy of the letter from Mary Rose Alexander to Evan Westerfield, dated October 7, 2011.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

October 13, 2011

/s/ Sabrina Mizrachi
Sabrina Mizrachi